

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
AT COLUMBUS**

<b>GARY E. LINDSAY, Regional Director</b>	:	
<b>Of the Ninth Region of the National Labor</b>	:	
<b>Relations Board, for and on behalf of the</b>	:	Civil Action No.: 2:18-cv-1165
<b>National Labor Relations Board</b>	:	
	:	Judge James L. Graham
<b>Petitioner,</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>SHAMROCK CARTAGE, INC.</b>	:	
	:	
<b>Respondent.</b>	:	

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**UNOPPOSED MOTION TO EXTEND THE TIME FOR RESPONDENT SHAMROCK  
CARTAGE, INC. TO RESPOND TO THE COURT'S ORDER TO SHOW CAUSE AND  
REPLY TO PETITIONER'S PETITION AND POINTS AND AUTHORITIES**

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COMES NOW Respondent Shamrock Cartage, Inc., by and through counsel, and hereby respectfully requests this Court grant Respondent **three additional days** to respond, answer, and oppose the Court's Order to Show Cause and Petitioner's Petition for Injunctive Relief and Points and Authorities and memorandum, up to and including 11:59 p.m. on Friday, **November 2, 2018**. Counsel for Petitioner is unopposed to this Motion and this is the first extension requested in this matter.

Respectfully submitted,

**/s John M. Milligan**

John M. Milligan (OH #0089385)

Counsel for Respondent

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**MEMORANDUM**

Upon conferring with opposing counsel, representative for Petitioner, Respondent respectfully requests a three day extension to respond to Petitioner's request for injunctive relief, Points and Authorities, and memorandum supporting same. Counsel for Petitioner indicated by electronic mail dated October 29, 2018 that he is unopposed to such a Motion submitted herein. This is the first such request made by either party in this matter.

Thus, Respondent, Shamrock Cartage, Inc. respectfully requests to be permitted up to and including 11:59 p.m. on Friday, November 2, 2018 to fully respond, reply, answer, and/or oppose the Order to Show Cause issued against it and the Points and Authorities and memorandum filed by Petitioner, herein. This Motion is accompanied by a proposed Order reflecting same and attached hereto as **Exhibit "A"**.

Respectfully submitted,

**/s John M. Milligan**

John M. Milligan (OH #0089385)

Counsel for Respondent

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2018, the foregoing was filed using the Clerk of Court's CM/ECF filing system which will send notice of such filing to all counsel of record, including:

Joseph F. Tansino (IL #6301008)  
Counsel for Petitioner  
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**/s/ John M. Milligan**

John M. Milligan (OH #0089385)